

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and)	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)	
Plaintiff,)	Honorable Aleta A. Trauger
vs.)	DECLARATION OF CHRISTOPHER M.
CORRECTIONS CORPORATION OF)	WOOD IN SUPPORT OF PLAINTIFF'S
AMERICA, et al.,)	MOTION TO EXCLUDE EXPERT
Defendants.)	TESTIMONY OF LUCY P. ALLEN
_____)	

I, Christopher M. Wood, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of Tennessee and this Court. I am a member of the law firm Robbins Geller Rudman & Dowd LLP, Lead Counsel for Lead Plaintiff and Class Representative Amalgamated Bank, as Trustee for the LongView Collective Investment Fund, and the Class in the above-captioned action. This Declaration is made in support of Plaintiff's Motion to Exclude Expert Testimony of Lucy P. Allen. I have personal knowledge of the matters stated herein, and, if called upon, I could and would competently testify thereto.

2. Attached hereto are true and correct copies of the following exhibits:

- Exhibit 1: Expert Report of Lucy P. Allen, dated August 7, 2020;
- Exhibit 2: Sally Q. Yates, Deputy Attorney General, *Reducing our Use of Private Prisons*, Memorandum for the Acting Director, Federal Bureau of Prisons, dated August 18, 2016;
- Exhibit 3: Expert Report of W. Scott Dalrymple, CFA, dated August 7, 2020;
- Exhibit 4: Rebuttal Expert Report of W. Scott Dalrymple, CFA, dated September 18, 2020;

- Exhibit 5: Excerpts from the deposition transcript of Lucy Allen, dated October 14, 2020;
- Exhibit 6: Excerpts from the deposition transcript of Lucy Allen, dated October 10, 2018;
- Exhibit 7: Excerpts from the deposition transcript of Kim White, dated October 30, 2020;
- Exhibit 8: Matt Zapotosky & Chico Harlan, *Justice Department says it will end use of private prisons*, Wash. Post, Aug. 18, 2016;
- Exhibit 9: Devlin Barrett & Austen Hufford, *Justice Department Says It Will Stop Using Private Prisons*, Wall St. J., Aug. 18, 2016; and
- Exhibit 10: Charlie Savage, *U.S. to Phase Out Use of Private Prisons for Federal Inmates*, N.Y. Times, Aug. 18, 2016.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 20th day of November, 2020, at Nashville, Tennessee.

s/ Christopher M. Wood
CHRISTOPHER M. WOOD

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on November 20, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Christopher M. Wood
CHRISTOPHER M. WOOD

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Mailing Information for a Case 3:16-cv-02267 Grae v. Corrections Corporation of America et al**Electronic Mail Notice List**

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